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**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

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**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**CITIES ADVOCATING REASONABLE DEREGULATION'S
ELEVENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Eleventh Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) calendar days of service hereof or no later than **March 29, 2021**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

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5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

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By: /s/ Brennan Foley

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of March, 2021, a true and correct copy of CARD's *Eleventh Set of Requests for Information to SWEPCO* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey

Leslie Lindsey

EXHIBIT A

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- 11-1.** Refer to the Direct Testimony of Chad Burnett at 5. According to Figure CMB-1, Industrial sales vary approximately 10% between summer and shoulder months. Please explain what level of variability is necessary before industrial sales are weather normalized.
- 11-2.** Refer to the Direct Testimony of Chad Burnett at 10. Figure CMB-3 shows the test year ending March 2020 energy slightly lower than the Docket No. 46449 test year energy. Please explain if these are both customer and weather adjusted amounts and provide an explanation of the reasons for the decline in energy since the prior test year.
- 11-3.** Refer to the Direct Testimony of Chad Burnett at 10. Please provide an update on the status of the idling of the U.S. Steel plant near Daingerfield, TX. When was the plant idled? Has any restart of the plant been announced? If so, when is the restart? Does SWEPCO provide any service to the plant while it is idled? If so, how much energy by month.
- 11-4.** Refer to the Direct Testimony of Chad Burnett at 10. Please provide an update on the status of the closure of the Domtar paper machine plant in Ashdown, AR. When was the plant closed? Has any restart of the plant been announced? If so, when is the restart? Does SWEPCO provide any service to the plant while it is closed? If so, how much energy by month.
- 11-5.** Refer to the Direct Testimony of Chad Burnett at 10. Please provide an update on the status of the closure of the Libby Glass plant in Shreveport, LA. When was the plant closed? Has any restart of the plant been announced? If so, when is the restart? Does SWEPCO provide any service to the plant while it is closed? If so, how much energy by month.
- 11-6.** Refer to the Direct Testimony of Chad Burnett at 11. Is SWEPCO aware of any large commercial or industrial facility planned to begin construction or operation within its service area in 2020 or later? If so, please describe the facility and the amount of demand and energy expected to be provided by SWEPCO. Did SWEPCO make any pro forma adjustments to the test year to account for these facilities? If so, please indicate where that information can be found in the filing.

- 11-7.** Refer to the Direct Testimony of John Aaron at 14. Please clarify if the allocation factors and processes reflected in the cost-of-service studies are the same as those approved by the Commission in Docket No. 46449 and updated in Docket No. 48233.
- 11-8.** Refer to the Direct Testimony of Jennifer Jackson at 24. Please explain the methodology for how SWEPCO is proposing to apply different rate changes to the North and East service territory lighting tariffs in order to move toward consolidating the lighting rates.
- 11-9.** Refer to the Direct Testimony of Jennifer Jackson at 25. Please explain the purpose of closing all lighting schedules except for the LED class of fixtures to new customers and new installations. What is the cost impact of replacing an existing high pressure sodium streetlight with an equivalent LED light?
- 11-10.** Refer to the Direct Testimony of Jennifer Jackson at 27. Please provide workpapers supporting:
- a. the proposed credit of \$0.03310 per kWh for PEV off-peak period usage.
 - b. the \$8.91 per month charge for an AMI meter capable of measuring the PEV usage.